

Plaintiffs' Exhibit 182

(Redacted)



Page 254

12 BY MS. CLEMONS:

17 MR. JUSTUS: Objection.
18 Form.

22 BY MS. CLEMONS:

2 MS. CLEMONS: Okay. We can
3 take a break.

4 THE VIDEOGRAPHER: Going
5 off record. The time is 1621.
6 (Short break.)

7 THE VIDEOGRAPHER: Going
8 back on the record. The time is
9 1647.

10 BY MS. CLEMONS:

11 Q. Before we went on break,
12 Professor Chevalier, you had mentioned
13 that advertisers don't directly pay for
14 exchange services.

15 Do you recall that
16 testimony?

17 A. Yes.

18 Q. What is your assessment
19 based on, that advertisers don't directly
20 pay for exchange services?

21 A. So advertisers, you know,
22 enter -- well, advertisers or their
23 agencies enter into contracts or
24 relationships with, you know, contract

Page 257

1 for the ad buying tools. And then the ad
2 buying tools, when they submit bids to ad
3 buying tools, they're -- you know, they
4 will pay a fee for the use of those ad
5 buying tools.

6 And then the fee that's
7 being paid to the ad exchange is
8 subtracted from the bid so that the bid
9 is -- so that the publisher is -- you
10 know, the publisher is choosing between
11 bids. But the publisher is the one who
12 enters into a contractual relationship
13 with the ad exchange.

14 Q. So is your statement that
15 advertisers don't directly pay for
16 exchange services based on advertisers
17 not having a contract to pay for exchange
18 services?

19 A. So the exchange services
20 are -- the exchange -- the exchange
21 services are deducted from the bid when
22 the bids are being, you know, evaluated
23 by the publisher.

24 And so, you know, I think

1 that's the sense in which I mean that.
2 Like, the advertiser pays kind of an
3 explicit fee off the top for the ad
4 buying tools, but the fee is deducted

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 MR. JUSTUS: Objection.
24 Form.

11 MS. CLEMONS: Can we go off
12 the record?
13 MR. JUSTUS: Sure.
14 THE VIDEOGRAPHER: Going
15 off the record. The time is
16 1845.
17 (Short break.)
18 THE VIDEOGRAPHER: Going
19 back on the record. The time is
20 1854.
21 MS. CLEMONS: Thank you so
22 much for your time today,
23 Professor Chevalier. I pass the
24 witness.

1 MR. JUSTUS: Nothing from
2 me.
3 MS. CLEMONS: Go off the
4 record.
5 THE VIDEOGRAPHER: This
6 marks the end of the deposition
7 of Judith Chevalier.
8 We're going off the record
9 at 1854.
10 *****
11 (Excused.)
12 (Deposition concluded at
13 approximately 6:54 p.m.)
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1
2 CERTIFICATE
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4
5 I HEREBY CERTIFY that the
6 witness was duly sworn by me and that the
7 deposition is a true record of the
8 testimony given by the witness.

8 It was requested before
9 completion of the deposition that the
10 witness, JUDITH A. CHEVALIER, Ph.D., have
11 the opportunity to read and sign the
12 deposition transcript.

10 
11
12 MICHELLE L. GRAY,
13 A Registered Professional
14 Reporter, Certified Shorthand
15 Reporter, Certified Realtime
16 Reporter, Certified Court
17 Reporter and Notary Public
18 Dated: March 6, 2024

16 (The foregoing certification
17 of this transcript does not apply to any
18 reproduction of the same by any means,
19 unless under the direct control and/or
20 supervision of the certifying reporter.)
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22
23
24

1 INSTRUCTIONS TO WITNESS
2
3 Please read your deposition
4 over carefully and make any necessary
5 corrections. You should state the reason
6 in the appropriate space on the errata
7 sheet for any corrections that are made.
8 After doing so, please sign
9 the errata sheet and date it.
10 You are signing same subject
11 to the changes you have noted on the
12 errata sheet, which will be attached to
13 your deposition.
14 It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within thirty (30) days
17 of receipt of the deposition transcript
18 by you. If you fail to do so, the
19 deposition transcript may be deemed to be
20 accurate and may be used in court.
21
22
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Page 330

1 - - - - -
 2 E R R A T A
 3 - - - - -
 4 PAGE LINE CHANGE
 5 _____
 6 REASON: _____
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Page 332

1 LAWYER'S NOTES
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Page 331

1
 2 ACKNOWLEDGMENT OF DEPONENT
 3
 4 I, _____, do
 5 hereby certify that I have read the
 6 foregoing pages, 1 - 332, and that the
 7 same is a correct transcription of the
 8 answers given by me to the questions
 9 therein propounded, except for the
 10 corrections or changes in form or
 11 substance, if any, noted in the attached
 12 Errata Sheet.
 13
 14
 15 _____
 16 JUDITH A. CHEVALIER, Ph.D. DATE
 17
 18
 19 Subscribed and sworn
 20 to before me this
 21 _____ day of _____, 20____.
 22 My commission expires: _____
 23 _____
 24 Notary Public

Attorney Errata Sheet for the Transcription of Judith A. Chevalier**Case Name:** *United States et al v. Google LLC*, No. 1:23-cv-00108-LMB-JFA (E.D. Va.)**Depo. Date:** March 5, 2024**Deponent:** Judith A. Chevalier

Page	Line	Original	Correction	Reason for Correction
3	21	Yin Jia Qiu – Economist (US DOJ) – zoom	Yin Jia Qiu – Economist (US DOJ) – in person	Transcription Error
26	23	“I would love details.”	“I would love details. Yes.”	Transcription Error
26	24	“Yes. Thanks. Sorry.”	“Thanks. Sorry.”	Transcription Error
40	13	“I really couldn’t single out”	“I really wouldn’t single out”	Transcription Error
74	15	“Google’s DV360 and Google’s ad products?”	“Google’s DV360 and Google Ads products?”	Transcription Error
77	11	“purchased through Xandr”	“purchased through Xandr’s”	Transcription Error
86	10	“during, before, or after videos”	“during, before, or after other videos”	Transcription Error
86	11	“videos that display in a display”	“videos that play in a display”	Transcription Error
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196	24	“targeting or pricing algorithms for”	“targeting or pricing algorithms or”	Transcription Error
221	21	“choices are valuable”	“choices are variable”	Transcription Error
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Date: April 9, 2024 Signature: /s/ Katherine E Clemons

HIGHLY CONFIDENTIAL**ERRATA SHEET FOR THE TRANSCRIPT OF:**Case Name: *United States et al. v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.)

Deposition Date: March 5, 2024

Deponent: Professor Judith Chevalier

CORRECTIONS

Page	Line	Change	Reason
30	15	Change "John" to "Jon"	Transcription Error.
49	10	Change "Professor Respass's" to "Dr. Respass's"	Clarification.
69	13	Change "compliment" to "complement"	Transcription Error.
80	19	Change "programatic" to "programmatic"	Transcription Error.
80	20	Change "programatic" to "programmatic"	Transcription Error.
238	8	Replace "Professor Respass" with "Dr. Respass"	Transcription Error.
325	14	Change "distribution" to "a distribution"	Transcription Error.

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefor.

Date: April 3, 2024Signature: Judith A Chevalier